# EXHIBIT A.1059



# PLACEHOLDER FOR EXHIBIT 1059

SEE ENCLOSED DVD

Time	English	Arabic
01:10-02:00	Good evening to our viewers. Good evening to all the prisoners, both men	مساء الخير يا مشاهدينا مساء الخير يا كل إخوانا
	and women, who are all our brothers serving prison sentences in Israeli	الأسرى والأسيرات في سجون الاحتلال الإسرائيلية
	occupation jails. We welcome you to this special segment of the program,	نرحب بكم معنا وهذه الحلقة الخاصة من برنامج
	"For You." This is the second time that	لأجلكم للمرة الثانية نلتقيكم من عمان من الأردن
	we are reporting to you from Amman, the capital of the brotherly State of Jordan. We have here the families of	الشقيق وأهالي الأسرى الأردنيين والمحكومين
	Jordanian prisoners and detainees, most of whom had received very long prison	الأغلب منهم بأحكام عالية وممنوعين نهائيا من
7	sentences. They have been prevented from communicating with their	التواصل مع ذويهم ومع أطفالهم ومع نسائهم وأبائهم
	relatives, their children, their spouses, and their mothers and fathers. This is	وأمهاتهم هذا بفعل الاحتلال الإسرائيلي. بعضهم
	all because of the Israeli occupation. Some of them are sick, and some, as I	مرضى وبعضهم كما ذكرت قبل قليل محكومين
	have said before, have received long prison sentences, and one of these is a	بأحكام عالية مثال أخي الأسير عبد الله البرغوثي
	dear brother, the prisoner Abdullah al- Barghouti. To him we convey our	والذي نوجه له التحية وهو يحمل أكبر حكم حيث
	regards as he is serving the longest prison sentence. He has received 67 life	محكوم عليه بـ 67 مؤبد، إذن اهلا ومرحبا بكم
	sentences. I welcome you again our dear viewers and I also welcome our	مشاهدينا واخوانا الأسرى وأهالي اخوانا الأسرى
	brothers, the prisoners, as well as the families of our brothers the Jordanian	الأردنيين من عمان - الأردن.
	prisoners, welcome to you from Amman, Jordan.	, a
03:45-13:05	Our dear viewers, we are communicating with you and with	نحن ننتواصل وإياكم مشاهدينا وإخوانا الأسرى
	our brothers, the prisoners. This is a special segment in the program, "For	وهذه الحلقة الخاصة من برنامج لأجلكم وأهالي
	You." Our greetings to the families and to the relatives of the Jordanian	وذوي الأسرى الأردنيين أكيد حابة أرحب بعائلة
*	prisoners. Of course, I would like to send my greetings to the families and	وذوي وأهل وأحباء الأسرى الأردنيين وأهل
	the relatives and parents, and dear friends of the Jordanian prisoners	وأحباننا طبعا سأبدأ هذه الحلقة مع والدة أخي
×	who all are our family and our loved ones. Naturally, I am going to start	الأسير عبد الله البرغوثي واللي بوجه له كل التحية

this segment with the mother of our brother, the prisoner, Abdullah al-Barghouti, to whom I send my sincerest greetings, and I hope that he will be set free promptly and very soon. Good evening, Umm Abdullah al-Barghouti. First off, how are you and how are you doing?

Answer: Praise Be to God Lord of All Worlds. We are doing fine and Praise Be to God, Lord of All Worlds. I hope that Abdullah will be able to watch this program so as to see us and get reassured about us. We are not able to pay him a visit even though we tried numerous times, from Jordan, to get a permit but to no avail. I hope that he will see us on the screen and hear our news and how we are doing and Praise Be to God Lord of All Worlds.

I would like to ask you this question. How many years has it been since you've seen Abdullah?

About 13 years or more.

13 years for a mother not to see her son. She knows... I mean, she realizes that he has 67 life terms. Hopefully, God will lift the hardship. When you think to yourself, and keep realizing that your son is gone, serving 67 life terms, plus you cannot see him and don't have any access to him to make sure that he is in good health. When you do that what is the message and what are the thoughts that come to your mind, especially when you are worried about him... what is the message that you would like to send... if you would like to send a message what do you want to say in that message.

وبتمنى له الحرية والفرج القريب والعاجل

- مساء الخير يا والدتي يا أم عبد الله البرغوثي شو أخبارك وكيف صحتك أول شيء؟

- الحمد لله رب العالمين أخبارنا كويسة والحمد لله رب العالمين وبنتمنى أن عبد يشوف في هذه الحلقة عشان يطمئن علينا ويشوفنا لأن مش قادر نروح زيارة عدة وعودات من الأردن وللأسف ما كان أي نتيجة فبنتمنى أن يشوفنا أخبارنا من كل النواحي والحمد لله يا رب العالمين.

بدي أسألك من كام سنة ما شوفتي لعبد الله؟

- في حوالي 13 سنة وأكثر

- 13 سنة الوالدة لما يغيب عنها ابنها ومدركة وعارفة شو يعني حكم 67 مؤيد إنشاء الله الله يفرج عنه ولكن كام لما بتطلع بينك وبين نفسك بتفكري بتلاقي أن ابنك محكوم 67 مؤيد وبعيد عنك ومش قادرة انك توصلي له تطمني عن صحته وعن أحواله شو الأفكار والرسالة اللي الأفكار بينك وبين نفسك من خوفك على ابنك زائد الرسالة اللي حبة توجيهيها إذا حابة توجهي رسالة شو حابة تحكى فيها؟

I swear that there isn't a single mother who forgets her son even for one second. I mean, the son is always on his mother's mind. Even if the mother is sitting with his children, or sitting with his wife, or if she the mother is alone, she still will be thinking about him and this is the case whether a mother has one child or ten children. She will keep thinking about her son who is absent. I mean, don't you know how a mother feels? I mean, it is very hard for the mother to keep waiting.

Of course, the mother always has the sincerest feelings and she is the one who is most capable to...

It's hard to explain it. The only thoughts that come to a mother's mind are not about good things that might happen, but on the contrary, about the bad things that might take place.

Do you get more worried about him when you hear day in and day out about the increasing number of sick prisoners in the occupation jails.

Yes, daily, that's why I am always worried about him. This is the most difficult part. I pray to God to protect to him and protect all prisoners against that because Israel, when it sees someone proud holding his head high, it tries to destroy him. There is no one to hold Israel answerable for its acts except God, the Lord of All Worlds. This is why I have to say that there is absolutely no hope, not even one percent.

Umm Abdullah, I would like to say that our prisoners do not stoop low. I am sure that their head are always - والله ما في أم بتنسى ابنها ولو لحظات يعني الابن دايما في تفكير ها يعني مثلا لو قاعدة بين ولاده لو قاعدة مع زوجته لو قاعدة لحالها إلا تظل أم تفكر في اللي غايب لو فيه عندها عشر ولاد بتظل تفكر في اللي غايب يعني مش عارفة أساس الأم يعني ما يقدرش الواحد يصبر

- الأم دوما أكيد الأم هي الأصدق وهي الأقدر على

- ما تقدرش توصف أن شو الأفكار ما بتجيش في الإشي الكويسة إلا في الإشي السيء

- بتخافي عليه في ظل كل ما بنسمع يوميا عن تزايد الحالات المرضية بسجون الاحتلال؟

- يوميا لهذا بفضل أخاف عليه يعني هذه أصعب نقطة إنشاء الله يبعدوا عنها هو وكل الأسرى لأن إسرائيل لو بتشوف أي واحد رافع راسه بتحاول تدمره مفيش حدا يحاسبها إلا رب العالمين ومن هنا مفيش امل واحد في المائة

 اسرانا ام عبد الله ما بيطمروا روسهم روسهم مرفوعة أكيد

- مرفوعة إنشاء الله لا والله بالعكس لما مرة بحكي أو إشي بيقولك أنا ما عملتش إشي أنا شو اللي عملته held high.

Held high God willing.

No, just the opposite. Once, when he spoke, or something like that, he said: "I have done nothing. What have I done to deserve 67 life terms. Had I known that I would be getting such a long sentence I would have done more. I mean, I don't regret it and I am not going to make a lot of noise and say that I have made a mistake and that I would ask for forgiveness. No, I will not do that. It is impossible."

He performed... he performed a heroic act, an act of struggle, and certainly he has conviction in what did. Hopefully, God will set him free. Umm Abdullah, of course Abdullah will see you on this program and he will also be listening to you. What is the message that you would like to deliver to your son?

I hope that he is in good health. I pray to God to reunite us with him and to reunite him with all his uncles, all of them, and with all his brothers, and with his wife and children. I mean, I always... I always think about these little children. I mean, I wish that they were with their father. And this is the most important thing. [rambling incoherent words] but he says that he has done nothing and that he doesn't regret it, not at all, neither now nor in the future.

God willing, he will always be in good health and will always remain steadfast and secure in his faith, and

يعني لحكم 67 مؤبد بتمنى أنه لو كان طويل الخروج قبل لعملت أكثر من هيك يعني مش ندمان أنه مثلا يطاطي ويقول أنا غلطت بدي أطلب السماح لا مستحيل

- هو عمل عمل بطولي ونضالي ومقتنع باللي أقدم عليه أكيد وأنشاء الله الله يفرج عنه لكن أم عبد من خلال برنامجنا أكيد أن عبد عم بيشوفك وعم بيسمعك شو الرسالة اللي حابة توصليها لابنك؟

- بتمنى له الصحة والعافية وإنشاء الله أنه يلم شملنا فيه ويلم شمله مع اخواله كلهم جميعهم واخواته ومرته وولاده أهم شيء يعني دايما أنا والله بيكون تفكيري في هؤلاء الولاد الصغار يعني أن يكونوا قبال أبو هم يعني الولد لما يكون أبوه بعيد عنه الطفل هذا إيه الصح أطفال يعني ولاده كلهم بس هو بيقولك انا عملت إشي مش ندمان عليه ولا راح أندم في يوم من الأيام

- إنشاء الله يظل بصحته ويظل باصراره وإيمانه أكيد والله يفرج عنه. حابة تضيفي شيء قبل ما ننتقل عند الوالد؟

- لا صحته بتصير كويسة من كتر إيمانه بالله

Case 1:04-cv-00397-GBD-RLE

His health will be good because he believes strongly in God.

Of course, because you and his father are pleased with him.

We are always pleased with him and there are no limits to that.

My dear, may God give you happiness.

If something... or anything...whenever I look to the right or the left I see a picture or I see some other effect for him, when that happens... let me say that I pray to God to lift this hardship and to enable the Jordanian government to secure a visit permit for us. One day. Over the past two months, I have been saying maybe it will happen today or it maybe it will happen...

Okay, God willing, you will be able to visit him and hopefully you will not be in need of a visit permit anymore because, God willing, Abdullah will be living a life of freedom very, very soon, he as well as all Jordanian prisoners who are not allowed to have visitors. I would like to offer my deepest thanks to the mother of Abdullah al-Barghouti, as well as to all the prisoners who are prohibited from receiving visitors, and especially, the prisoners from Jordan. Certainly there are other Arab prisoners who are forbidden from any contact, not even with their families and relatives. To all of you I send my greetings and now I am going to see the father of the prisoner . برضاكي وبرضا والده أكيد

- رضا الوالدين هذا باستمر ار لا يوصف

حبيبتي الله يسعدك

- حركة لو أي شيء لو هيك اطلعت يمين شمال بتلاقى صورة بتلاقى إشى بتلاقى إشى في تفكير الواحد إشى بيطلع للولد إنشاء الله ربنا يفرجها عليه ويقدر الحكومة الأردنية أنها تعمل لنا زيارات إذا في يوم من الأيام قدرت أنا لي شهرين تقولي اليوم هذا اليوم هذا

ـ يالا إنشاء الله أن بتزوروه وإنشاء الله يا أم عبده ما بتحتاجوا لزيارة إنشاء الله عبد الله يعيش حياة الحرية قريبا أكيد وكل الأسرى الأردنيين الممنوعين بدى اشكرك شكرا جزيلا لوالدة أخى عيد الله اليرغوثي كل الأسرى الممنوعين من الزيارة نهانيا تحديدا الأسرى من الأردن وأكيد فيه اسرى عرب ممنوعين من التواصل حتى مع ذويهم ومع أهلهم وبوجه لكم كل التحية وبتوجه لعند والد أخى الأسير عبد الله البرغوثي

مساء الخيريا والدى قبل فترة الأسرى الأردنيين كانوا مضربين عن الطعام وكان من ضمن مطالبهم

Abdullah al-Barghouti. Good evening my dear dad. Sometime ago, the Jordanian prisoners were on a hunger strike and, one of their demands - their demands are well known - but I would like to concentrate on one of their demands which was satisfied by the Israelis, and this is why they ended their hunger strike. The demand was that their families will be given a permit to visit them from time to time. But since the date of that agreement, no visits have taken place. Is that true?

Case 1:04-cv-00397-GBD-RLE

First of all, before anything else, I would like to send my greetings to all those present. I am thankful to them for being here on this program and I also would like to give my greetings to this channel and to those who work with it. They did promise us but unfortunately they never honored their promises, not until now. When the 100 prisoners went on strike for a certain number of days, the Prisoners Committee reached an agreement with the prisoners, and in that agreement, they promised that every prisoner will be allowed to have 5 visitors who will be members of his family, and without a separation glass window. However, they sent us a correspondence in which they said that they will only allow 3 relatives and from behind a glass window. I mean, this is how the Jews are. They have no principles. Unfortunately, the Arab states... the Arab states cannot... and our Jordanian government is not able to do anything.

y dear dad, we are talking about 13 years. Like his mother, you haven't seen Abdullah for 13 years. 13 years taken from your life as well as from his life and as we say, our

كل مطالبهم معروفة لكن بدى اركز على احد مطالبهم اللي تم الموافقة عليها على أساس فكوا إضرابهم من قبل الإسرائيليين وهي زيارة ذويهم ما بين فترة وأخرى من وقت اللي صار الاتفاق إلى الآن ما تمت هذه الزيارات صحيح؟

- أول شيء قبل كل شيء بحييكي وبحيي الحضور على حضور هم هذا البرنامج وأحيى هذه القناة و القائمين عليها. أو عدونا للأسف الشديد لم يوفوا بعهودهم لحد الآن أول لما اضرب 100 وكذا يوم ولجنة السجون والأسرى أوعدوا أن خمسة يزوروهم من أهله مفيش حاجز زجاج ما في ولكن و دو لنا كتاب أنه بس 3 من أهله يز و رهم من و ر ا الزجاج حتى فهذا يهود يعني ما لهمش مبدأ وللأسف الدولة الدول العربية ما فيه ودولتنا الأر دنية مش طالع بإيدها ولا حاجة

- يا والدى 13 سنة أنت أكيد مثل الوالدة ما شوفتوا لعبد الله 13 سنة بتاخد من عمرك وبتاخد من عمره ودايما إحنا بنحكي الأرض باقية والأقصى باقى وكل شيء باقى على الأرض ولكن الإنسان بيحيا لمرة واحدة إحنا من خوفنا على ولادنا بالسجون دائما بنطالب بالإفراج عنهم شو الرسالة أوالكلمة اللي حابب توجهها بخصوص land will always be there forever. and the al-Aqsa will be there, and everything on our land will be there for good. But human beings have one life to live and because of our worry about our children who are in jail, we always seek their release. What is the message, or what is the thought that you would like to deliver to the prisoners who have received very long prison sentences and have already spent many long years behind bars?

**Document 547-587** 

I swear to God that I love every prisoner and I have deep respect for each one of them. I am not saying that only in regard to Abdullah al-Barghouti, but I am saying it in regard to all of them. My son Abdullah was sentenced to 3000 years. I mean, 3500 years, because he torched 67 of their dead plus 500 hundred wounded. This means 99 years for each one killed, and the 500 who are wounded – may God never heal them -- one year for each one of them, which means another 500 years on the top of the 3000. I mean, I am very proud and if I were like Abdullah I would cross the bridge tomorrow.

I ay God grace you with good health and we are all proud of Abdullah.

All the prisoners, not just Abdullah al-Barghouti, are a source of pride for me and I wish them the best of health and pray to God to see them free very soon, with the permission of God.

God willing, you will always be in good health. Now I would like you to send a message that says that you are pleased with him... what would you

الأسرى المحكومين أحكام عالية واللي قضوا سنين طويلة في السجون

- والله أنا بحيى كل أسير وكل أسير على رأسى مش عبد الله البرغوثي الجميع كلهم عبد الله وابني انحكم يعنى 3000 سنة وخمسمائة عام لأنه حرق منهم 67 قتيل و 500 جريح وكل قتيل 99 سنة والخمسمائة قتيل جريح الله لا يشفيهم 500 عام وأنا يعني أفتخر وأعتز والله لو بقدر إنى أصير مثل عبد الله لدخلت بكرة على الجسر

- الله يعطيك الصحة كلنا بنفتخر بعبد الله

-كل الأسرى مش عبد الله البر غوثي وكل أسرانا على راسى وأتمنى لهم إنشاء الله الصحة والعافية وبيخرجوا عن قريب بإذن الله

- باذن الله رينا يعطيك الصحة والعافية. بدى منك هلا رسالة كلمة رضا منك لعبد الله شو حابب تقوله منك له اتفضل

-منى له و الله منى له بقول له يا با الله يعطيك العافية وماقصرت واحنا بدنا المزيد إنشاء الله وبنطلب الحكومة الأردنية لأن أنا صار لي 13 سنة وأكثر ما شوفت ابنى بوصيه بقول له الله يعطيك

#### الصحة والعافية يابا و لا تيأس لا ياس مع الحياة like to tell him, please go ahead. From me to him... from me to him, I واحنا معاك إنشاء الله قلبا وقالبا وكل اللي بيحبوك would tell him, "Son, may God give you good health. You have not dodged واقفين معاك وإنشاء الله إنشاء الله أوعدتنا الحكومة your responsibilities. And we want more, God willing. And we ask the ولكن انسى وإنشاء الله بنطلب من رب العالمين احنا Jordanian government, because I haven't seen my son for more than 13 اكبر من الحكومة وأكبر من مجلس الأمن ومجلس years... I would like to say to him, "May God give you good health and الأمة و إنشاء الله بنشوفك عن قريب بإذن الله strength. Don't despair. Despair does not mix with life. We are with you in body and soul. All those who love you - إنشاء الله حانخلي إيماننا فقط في رب العالمين support you. And God willing... God willing, the government promised us... إنشاء الله ربنا بينصف كل أسرانا وبيتحرروا قريبا forget about it...God willing, we pray to the Lord of All Worlds... we are مع احترامنا لكل الجهود التي تبذل من أجل الأسرى above the government, and above the Security Council, and above سواء عن الأسرى الفلسطينيين أو الأسرى العرب Parliament, God willing, we will see you very soon with the permission of أو الأسرى الأردنيين بشكل عام نتحدث عن God." الأسرى نحترم كل الجهود التي تبذل ولكن كما ذكر We will only have faith in the Lord of All Worlds. We pray to God to be والد عبد الله البرغوثي هذا هو الاحتلال الذي يتعمد fair to all our prisoners and to bring about their release very soon. We قتل الأسرى حتى وهم في سجون الاحتلال greatly appreciate all the efforts exerted on behalf of the prisoners, الأسرائيلية whether the Palestinian prisoners or the Arab prisoners or the Jordanian prisoners, I mean all of the prisoners. We respect all efforts made but, as the father of Abdullah al-Barghouti has said, this is the nature of occupation. It is an occupation that intentionally kills the prisoners even when they are locked inside the jails of Israeli occupation. English Arabic Sign on This special segment on Jordanian حلقة خاصة عن الأسرى الأر دنيين في سجون wall in prisoners in Israeli occupation jails

**Document 547-587** 

background	The Palestinian Prisoner Club  The chain must be broken	الاحتلال الإسرائيلي نادي الأسير الفلسطيني لا بد للقيد أن ينكسر
Sign on wall in background at 6 minutes	Ministry for Prisoners Affairs The Palestinian Prisoner Club In collaboration with Palestine TV – "For You" program We all welcome the sons of our people as well as the parents and relatives of the prisoners and the detainees.	وزارة شؤون الاسرى والمحررين – ونادي الاسير الفلسطيني بالتعاون مع تلفزيون فلسطين – برنامج لاجلكم يرحبون بأبناء شعبنا وذوي الاسرى والاسرى

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.,

Plaintiffs,

VS.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

### DECLARATION OF CLARK HAYES

Clark Hayes hereby certifies as follows:

- 1. The attached translation from Arabic to English is an accurate representation of the video, or portion thereof, received by Rina Ne'eman Hebrew Language Services, to the best of my knowledge and belief. The video, or portion thereof, is designated as P 7: 495.
- 2. I am a professional translator with advanced ACTFL Certification in Arabic. I am fluent in Arabic and English, and I am qualified to translate accurately from Arabic to English.
- 3. To the best of my knowledge and belief, the accompanying text is a true and accurate translation of the Arabic-language video, or portion thereof, bearing the bates number P 7: 495.

Dated: March 12, 2014

ss.: New Jersey Wew York

On the 12 day of March, 2014 before me, the undersigned, personally appeared Clark Hayes, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is signed to this Declaration and acknowledged to me that he executed the same in his capacity, and that by his signature on this Declaration, the individual executed the Declaration.

Sworn to me this /2 day of March, 2014

Notary Public

NOTARY PUBLIC, State of New York
No. 019M6162573
Qualified in Kings County
Commission Expires March 12, 20 15